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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
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8 SCANNING TECHNOLOGIES
9 INNOVATIONS LLC,
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11 Plaintiff,
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13 v.
14 SMARTOSC US LLC,
15

16 Defendant.
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18 Civil Action No. Case No. 2:19-cv-1002-RAJ
19

20 **MOTION FOR DEFAULT JUDGMENT**
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22 **NOTE ON MOTION CALENDAR: APRIL 22, 2020**
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24 Plaintiff, Scanning Technologies Innovations LLC (“STI”) hereby submits this Motion For
25 Default Judgment.

26 1. On June 27, 2019, Plaintiff filed its Original Complaint against Smartosc US LLC
27 (Dkt. 1) alleging infringement of U.S. Patent No. 9,466,078. Defendant Smartosc US LLC was served
28 on July 3, 2019. Defendant was required to file an answer to the complaint on July 24, 2019.

1. To date Defendant Smartosc US LLC has not filed an answer or otherwise responded
2. to the complaint.

3. On September 9, 2019 Plaintiff Scanning Technologies LLC filed its Motion For
4. Entry of Default Judgment (Dkt. 9). The court entered the Clerk’s Entry of Default on September 10,
5. 2019 (Dkt. 11). To date, Defendant has not filed an answer to the Original Complaint.

6. Plaintiff respectfully submits that damages should be based upon a reasonable royalty
7.

1 and that the reasonable royalty should be calculated as set forth in the Affidavit of Leigh Rothschild
2 (Exhibit A); see paragraphs 4-8. The amount of a reasonable royalty according to this calculation is
3 \$1,071,000.

4 5. At a minimum, damages should be no lower than \$50,000. See Exhibit A, paragraphs
5 9-11.

6 6. Plaintiff respectfully asks this court to enter a default judgment in favor of Plaintiff
7 ordering Defendant to pay Plaintiff an amount of damages of \$1,071,000, but no less than \$50,000.

8 Plaintiff Scanning Technologies Innovations LLC therefore moves the Court for an order of
9 Default Judgment.

10 Dated: April 22, 2020

11 Respectfully Submitted,

12 By: /s/ Nicholas Ranallo

13 Nicholas Ranallo

14 **NICHOLAS RANALLO, ATTORNEY AT
LAW**

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20 **ATTORNEYS FOR PLAINTIFF**

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